

Statement of Work

I. Title: Section 111(d) EGU GHG Implementation Assistance

Contractor Name: ICF International

Contract #: EP-W-12-010 -- Option Period 3: April 1, 2015 - March 31, 2016

WA #: WA 3-34

II. Work Assignment Manager (WAM):

WAM Name: Elineth Torres
U.S. Environmental Protection Agency
OAR/Office of Air Quality Planning and Standards
Sector Policies and Programs Division
Durham, NC 27711
Phone: (919) 541-4347

Alternate WAM Name: Debra Dalcher
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III. Background

The EPA will be finalizing federal guidelines under section 111(d) of the Clean Air Act (CAA) to address carbon pollution from existing power plants. Section 111(d) establishes a mechanism for controlling air pollution from existing sources: the EPA establishes guidelines and the states then design programs that meet those guidelines, establishing standards of performance and getting the needed reductions. Once the EPA has established the emission guidelines, states will develop and submit to the EPA for approval, state plans (hereinafter referred to as Plans) for implementing and enforcing the standards of performance. The EPA is then to review and approve them if it determines the Plans are satisfactory.

The EPA is developing the infrastructure needed to help states develop satisfactory Plans and to help the EPA review Plans within the timeframe allowed in the regulatory framework. The objective of work assignment is to:

1) Provide support to EPA in developing the infrastructure needed to support the development, approval and implementation of Plans due once EPA finalizes carbon pollution standards for existing power plants under section 111(d) of the CAA,

2) Develop implementation materials, including templates, checklists, schedules and other support materials for EPA to assist states developing plans and for the review of such plans, and

3) Provide support to develop training materials for states and other stakeholders to implement the final Emission Guidelines. As needed provide facilitation and support for implementation training/outreach/webinars. No work shall be duplicated in this work assignment relative to other work assignments.

IV. Work Plan

Task 1. Work Plan and Budget Estimate

The Contractor shall meet with the Work Assignment Manager (WAM) to discuss the WA tasks and deliverables. This meeting can be via teleconference. The Contractor shall then prepare and submit a work plan and cost estimate for the WA consisting of the project plans and budget estimates itemized for each task. The budget estimates should include breakdowns of elements by cost, professional level, subcontractors, and other direct costs. Work may begin on all tasks during preparation of the work plan, if directed by the WAM.

The Contractor shall participate in administrative meetings and/or conference calls at the written request of the WAM. The technical work of each task will be directed by the WAM. The Contractor shall participate in meetings and/or conferences calls at the written request of the WAM. The WAM will determine the date and location of these meetings/calls.

Task 2: QA Requirements

The EPA's quality assurance policy requires every environmental data operation (EDO) to have written and approved quality documentation prior to the start of the EDO. Quality documentation, such as a quality assurance project plan (QAPP) is prepared, reviewed, and approved in accordance with the guidance contained within OAQPS's QMP.

The Sector Policies and Programs Division (SPPD) utilizes a two-tiered project category approach to its QA Program in order to effectively focus QA. Project Lead or WAMs, with consultation from the quality assurance manager (QAM) or QA Officer, will be required to designate the category of the project. Category I Projects require the most stringent QA requirements, whereas Category II projects are the least stringent. Details of this are specified in Section 2 of the OAQPS Quality Management Plan (QMP).

With consultation from the Quality Assurance Manager (QAM) or the Deputy Quality Assurance Officer, the work required in this assignment has been preliminarily determined to be classified as **Category II** by the WAM.

Within one month of the effective date of the WA and prior to any EDO, the Contractor shall provide the WAM with a project-specific document that explains the Contractor's quality documentation for the WA. The quality documentation shall address the appropriate requirements specified in the OAQPS QMP. The WAM will review the quality documentation and provide comments to the Contractor in writing within 2 weeks. The Contractor shall

incorporate comments from the WAM into the quality documentation and return it to the WAM within one week.

Task 3: Assist EPA's Development of an Infrastructure to implement the EGU 111(d) rule for existing sources:

The Contractor shall provide support to EPA in developing an efficient, flexible and streamlined process infrastructure for helping states develop approvable 111(d) plans.

- a. As requested, assist in the development of draft implementation processes (processes for assisting states and reviewing plans) and provide recommendations for improving efficiency, flexibility and streamlining of such processes. These processes include those to support the electronic system for Plan submittal, tracking and review.
- b. As requested, participate in weekly phone calls with the Implementation Team - Weekly calls of 1 to 1.5 hours per week are estimated
- c. As requested, track and report to EPA state plan development activities and third-party tools and infrastructure to support states in plan development. (E.g., track implementation tools and strategies being considered by the states, legislative and regulatory status, timelines, renewable portfolio standards, utilities Integrated Resource Planning (IRPs), utilities GHG commitments, etc.)

Task 4: Support Development of Implementation Products:

- a. The Contractor shall develop tools and products to facilitate implementation of 111(d) emission guidelines. Implementation products can include state plan template and completeness checklists for states and EPA, a decision tree for state plan approaches, graphical depiction of steps states will have to consider for plan development, inventory of federal programs that reduce CO₂ from power plants, 111(d) applicability diagram, database of FAQs, plan review protocol, elevation protocol, etc.
 - Edit, revise, and review content of all deliverables to address comments, increase usability, and ensure effective messaging for intended audiences;
 - Produce summary tables/maps/figures and other features to enhance content and readability of implementation products.
- b. Electronic System: As requested by the WAM, the Contractor shall work with OAQPS staff to determine the type of system requirements needed (i.e., web-based, EPA-wide, publicly available) and design features of an electronic system for 111(d) plan submittal, tracking and review system. Actual system development is not included in this task.
 - Develop information materials to support development of electronic system (e.g., designs for system interfaces, interactive wireframes, system business rules, etc.)
 - Conduct testing of system (e.g., run model plans through system, iteratively test system, inform training and guidance materials, etc.)

- Identify ways to automate process of submittal, tracking and review of plans and identify anticipated structure of plans and acceptable collection and review process flows.
- c. HQ & Regional Collaboration Assistance: As requested by the WAM, the Contractor shall assist in the development of needs assessment, development and delivery of implementation training/workshops/materials for capacity building and technical assistance for EPA HQ and regional implementation staff.
- d. States, Tribes and Territories (STT) Assistance. As requested by the WAM, the Contractor shall assist in the development of need assessments, development and delivery of implementation trainings/workshops/materials and delivery of technical assistance to states, tribes, territories and other identified stakeholders as they develop 111(d) state plans.

V. Deliverables

| Task | Deliverable | Delivery Schedule |
|------|---|---|
| 1 | Work Plan & Budget Estimate | 20 days after the effective date of WA |
| 2 | Quality documentation for the WA | Within one month of the effective date of the WA and prior to any EDO |
| 3 | Assist EPA's Development of an Infrastructure to implement the EGU 111(d) rule for existing sources | |
| 3a | Implementation processes | On going |
| 3b | Participation in Implementation WG calls | As requested |
| 3c | Tracking state plan development activities..... | On going |
| 4 | Support Development of Implementation Products | |
| 4a | Implementation products & tools..... | On going |
| 4b | Electronic Tracking System..... | On going |
| 4c | EPA Collaboration & Technical Assistance..... | On going |
| 4d | STT Assistance..... | On going |

VI. Reporting Requirements

The Contractor shall provide monthly progress reports, itemized by task, in accordance with the terms of the contract. These reports shall include hours and dollars spent by task, as well as a description of the work completed and deliverables produced. The Contractor shall provide written notification to the WAM within 30 days of when it anticipates expending 75 percent of the budgeted labor hours and/or budget dollars in the approved work plan. The Contractor shall

submit work products in electronic and as needed in hard copy form. In addition, the Contractor shall deliver to the WAM each draft and final report in electronic format that is readable by windows-based word-processing (Microsoft Word 2013), graphics (Microsoft PowerPoint 2013), spreadsheet (Excel 2013), and database (Access 2013) programs. The Contractor shall also provide electronic copies of reports in PDF format.